

SEP 23 1988
OFFICE OF
REGIONAL ADMINISTRATOR

SeattleSteel 

September 21, 1988

Robbie Russell
Regional Administrator
1200 6th Ave
Seattle, WA 98101

RECEIVED
SEP 26 1988
WASTE MANAGEMENT BRANCH

Subject: Soft Hammer Demonstration/Certification

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, Seattle Steel, Inc. has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8 (a)(2) for EPA waste code(s) K061.

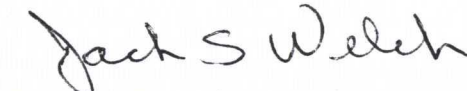
The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that:

No practically available treatment exists. See attached demonstration for further details.

If any further information is required, please contact me at (206)938-7025.

Very truly yours,

SEATTLE STEEL, INC.



J. S. Welch
Manager - Safety and Health

JSW:b

USEPA RCRA

3014084

Mail: C 3827
Seattle, WA 98124
206-938-6800
800-562-4522 (inside WA)
800-426-4530 (outside WA)

SOFT HAMMER DEMONSTRATION

FACILITY OWNER	LOCATION	TREATMENT METHOD	TELEPHONE	CONTACT	DATE	EXPLANATION*
1. USPCI	Poplar VA	Chem Recovery	(714) 305-9595	Bill Schwartz	7-19-88	(1)(6)
2. Horsehead Resource Development New Jersey Zinc	Palmerton PA	High Temp Recovery				Will not accept material due to low percentage of Zinc Present (1)(6)
3. Chem-Recovery Systems	Englewood CO.	Chem Recovery	(303) 707-8833	Don Boothby	6-22-88	

This waste is in the form of contaminated filter bags ~~with~~ with a very low percentage of fine dust. There is ~~not~~ treatment available ~~that~~ has been demonstrate that will meet the new EPA standards for K061 wastes on this type of material.

*For no available treatment: insert number key from Attachment 3.

For available treatment: insert the letter key from Attachment 4.

"SOFT-HAMMER" WASTES

LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM

Generator Name: Seattle Steel Inc.

Manifest Number: 88022

EPA ID Number: WAD 009265851

CWM Profile Number: PDX V95108

This form is submitted to _____ in accordance with 40 CFR Part 268, which restricts the land disposal of certain hazardous wastes. I have marked the appropriate box below to indicate whether alternative treatment has been found for my waste. (See reverse side for the list of "soft-hammer" wastes and instructions on using this form.)

☐ I. SOFT-HAMMER WASTE FOR WHICH ALTERNATIVE TREATMENT OR RECOVERY HAS BEEN LOCATED

The soft-hammer waste I generate is(are) _____

I have identified a practically available treatment technology that yields the greatest environmental benefit. Together with the initial shipment of waste represented by this form, I submitted a demonstration in accordance with 40 CFR 268.8(a)(1), including a list of facilities and facility officials contacted, complete with addresses, telephone numbers, and contact dates, and a justification that I have chosen the best treatment that is practically available.

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

☒ II. SOFT-HAMMER WASTE FOR WHICH DISPOSAL IN LANDFILL OR SURFACE IMPOUNDMENT IS THE ONLY PRACTICAL ALTERNATIVE TO TREATMENT CURRENTLY AVAILABLE

The soft-hammer waste(s) I generate or have treated is(are) _____

Baghouse Filter Bags with K061 Dust

I have made a good-faith effort to locate and contract with treatment and recovery facilities practically available which can meaningfully reduce the toxicity or mobility of hazardous constituents in the waste, as an alternative to land disposal. I have found no such alternative facility. Together with the initial shipment of waste represented by this form, I submitted a demonstration in accordance with 40 CFR 268.8(a)(2), including a list of facilities and facility officials contacted, addresses, telephone numbers, contact dates, and an explanation of why no treatment is practically available. This soft-hammer waste must be disposed of in a landfill or surface impoundment meeting the minimum technological standards until treatment standards are set for the waste or May 8, 1990, whichever occurs first.

"I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

☐ III. TREATMENT OR RECOVERY FACILITY HAS TREATED THE WASTE

The following soft-hammer waste(s) was treated in accordance with the generator's demonstration: _____

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

☐ IV. SOFT-HAMMER WASTE DESTINED FOR LAND DISPOSAL OTHER THAN IN LANDFILL OR SURFACE IMPOUNDMENT (e.g. DEEP INJECTION WELL)

The soft-hammer waste(s) I generate is(are) _____ . This waste is being disposed of in a land disposal unit other than a landfill or surface impoundment and therefore is not subject to the certification and demonstration requirements of Section II.

Signature

John Welch

Title

Manager Safety & Health

Date

9-16-88

